

JUDY ANN ENDERS/MADEN  
September 6<sup>TH</sup> 2006

PROSKAUER ROSE LLP  
KATHERINE F WARMFELD

RE ENDERS/MADEN V. SUPER FRESH FOOD  
MARKET INC.  
DOCKET # CA NO 05-669-SLR

Scanned- 9/13/06

TO PROSAVE ROSE



WE ARE WRITING TO ADDRESS DEFICIENCIES IN  
OR RESPONSE TO YOUR REQUEST FOR  
DISCOVERY, AND TO ADDRESS DISCOVERY WE  
HAVE REQUESTED AND HAVE NOT RECEIVED.  
WE ARE ALSO REQUESTING NEW DISCOVERIES.

AS TO YOUR LETTER SENT ON AUGUST 25<sup>TH</sup>, 2006.  
AS TO DOCUMENT REQUEST # 1, WE HAVE NOT  
RECEIVED ANY DOCUMENTS RELATED TO ANY  
OFFERS OF EMPLOYMENT BY SUPER FRESH  
FOODS.

AS TO DOCUMENT REQUEST # 2, WE DO NOT  
HAVE AN OTHER DOCUMENTS RELATED TO THE  
TERMS AND CONDITIONS OF EMPLOYMENT WITH  
SUPER FRESH FOODS.

AS TO DOCUMENT REQUEST # 3, WE DO NOT HAVE ANY OTHER DOCUMENTS REGARDING EVALUATIONS OF THE PLAINTIFF AS AN EMPLOYEE AT SUPER FRESH FOODS.

AS TO DOCUMENT REQUEST # 5, WE DO NOT HAVE ANY APPOINTMENT BOOKS, DIARIES, TIME SHEETS AND OR CALENDERS, OTHER THAN WHAT WE HAVE ALREADY SENT YOU.

AS TO DOCUMENT REQUEST # 6, WE DO NOT HAVE ANY OTHER DOCUMENTS REGARDING PLAINTIFFS, SEPARATION OF EMPLOYMENT FROM SUPER FRESH FOODS.

AS TO DOCUMENT REQUEST # 7, WE DO NOT HAVE ANY OTHER REASONS FOR PLAINTIFFS SEPARATION FROM SUPER FRESH FOODS.

AS TO DOCUMENT REQUEST # 13, WE DO NOT HAVE ANY OTHER COPIES OF FEDERAL, STATE, OR LOCAL INCOME TAX RETURNS ( including all schedules, forms, statements and exhibits) . WE DO NOT HAVE ANY PAYCHECK STUBS, W-2 FORMS AND/OR FORM 1099S. ALL DOCUMENTS WHICH REFLECT ON PLAINTIFF, RECEIPT OF INCOME FROM YEAR 2002, THROUGH THE PRESENT HAVE BEEN SENT.

AS TO DOCUMENT REQUEST # 17, WE HAVE THE DOCUMENT AT THIS TIME REGARDING

TERMINATION, OF PLAINTIFFS EMPLOMENT AT SUPER FRESH FOODS. A COPY OF THE DOCUMENT WILL BE ATTACHED TO THIS LETTER.

AS TO DOCUMENT REQUEST # 19, WE ARE CONFIRMNG THAT WE ARE NOT WITHDRAWLING THE ALLEGATIN THAT THE PLAINTIFF, WAS FORCED TO TOLERATE FROM A SUPER FRESH SUPERIOR. THE FONDLING OF BREAST, REAREND, AND, ALSO THE TOUCHING OF FRONT PRIVATE PARTS. PROOF OF THIS WILL BE PROVIDED AT A LATER DATE.

AS TO DOCUMENT REQUEST # 20, WE DO NOT HAVE ANY OTHER DOCUMENTS REGARDING SCHEDULES PREFERENCE TO MEN. REPEATEDLY SCHEDULNG ME WHEN DAY CARE WAS CLOSED. EVEN THOUGH MY BOSS, WAS GIVEN TIMELY NOTICE.

AS TO DOCUMENT REQUEST # 21, WE DO NOT HAVE AN OTHER DOCUMENTS RELATED TO DAMANGES, LOSS OF EARNINGS, EARNNNGS CAPACITY AND OR BENEFITS AS A RESULT OF SUPER FRESH FOODS ALLEGED CONDCUCT AS SE FORHT IN THE COMPLAINT.

AS TO DOCUMENT REQUEST # 24, WE DO NOT HAVE ANY OTHER DOCUMENTS NOT PREVIOUSLY REQUESTED THAT CONTAIN OR

DISCRIBE SUPER FRESH FOODS POLICIES OR PRACTICES.

AS TO DOCUMENT REQUEST # 25, WE DONOT HAVE ANYOTHER DOCUMENTS RELATED TO COMPLAINTS, CHARGES OR WRITTEN SUBMISSIONS FILED BY PLAINTIFF, WITH SUPER FRESH FOODS, AND OR ANY EMPLOYEE OF SUPER FRESH FOODS PERTAINING TO ALLEGATIONS CONTAINED IN THE COMPLAINT.

AS TO DOCUMENT REQUEST # 26, WE DO NOT HAVE ANYOHER DOCUMENTS INCLUDING BUT NOT LIMITED TO TAPE RECORDINGS AND OR E-MAILS, (EXCEPT WITNESS LIST), CONTAINING DESCRIBING OR RELEVANT TO COMMUNICATIONS, (WHETHER ORAL OR WRITTEN), BETWEEN PLAINTIFF AND ANY OFFICER, EMPLOYEE, OR AGENT OF SUPER FRESH FOODS, THAT REFER OR RELATE IN ANYWAY TO ALLEGATIONS CONTAINED IN THE COMPLAINT.

AS TO DOCUMENT REQUEST # 27, WE DO NOT HAVE ANY OTHER DOCUMENTS NOT PREVIOUSLY REQUESTED CONCERNING PLAINTIFFS, ALLEGATION SAGAINST SUPER FRESH FOODS.

AS TO DOCUMENT REQUEST # 28, WE DO NOT HAVE ANY OTHER DOCUMENTS NOT PREVIOUSLY REQUESTED OR PRODUCED ABOVE

**CONCERNING PLAINTIFFS, EMPLOYMENT WITH  
SUPER FRESH FOODS.**

JUDY ENDERS/MADEN

*Judy Enders/Maden*

U.S. POST  
CLAYTON  
SEP 11  
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Mary Port Thyng  
U.S. Magistrate Judge

United States District Court  
District of De,  
U.S. Court House  
Wilm. De. 19801

